

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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FCS ADVISORS, LLC,

Plaintiff,

--against--

21 Civ. 6995 (PKC)

THEIA GROUP, INC., d/b/a “THORIAN GROUP”  
and/or “CYPHERIAN”; THEIA AVIATION, LL;  
and THEIA HOLDINGS A, INC., d/b/a “THORIAN  
HOLDINGS,”

**NOTICE OF MOTION**

Defendants

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PLEASE TAKE NOTICE that, upon the accompanying Memorandum, and upon the accompanying Declaration of Michael Schlappig, including all of the exhibits appended thereto, PJT Partners LP (“PJT”) will move this Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order granting (1) the Sale Motion which surcharges FCS the amount of PJT’s minimum Transaction Fee (as defined in the Memorandum), plus PJT’s reasonable professional fees and expenses, to be paid by FCS’ acquisition vehicle, and (2) such other and further relief as is just and proper.

*[Remainder of page intentionally left blank]*

Dated: August 28, 2023  
New York, New York

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/ Robert D. Drain

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-and-

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